

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Rhonshawn Jackson,
Plaintiff

: Civil Action No. 16-33ERIE

V.

: Judge Baxter

FILED

PA Dept. of Corr., et al;
Defendants

" JURY DEMAND

NOV 12 2020

U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

PLAINTIFF'S MOTION FOR APPOINTMENT OF COUNSEL FOR 11/16/20 TRIAL:

Plaintiff is resubmitting his motion for appointment of counsel because he has an upcoming trial coming up on November 16, 2020, & he was told by this court that his case was submitted for attorney review on June 16, 2020, but as of date plaintiff has not been appointed an attorney for his upcoming trial.

Plaintiff has reached out to Attorney's Timothy Mazzocca & Scott A. Bradley, with his settlement proposals & other correspondence since June 2020, but both parties refuse to respond to any of plaintiff's attempts to settle this matter. We are now mere days away from plaintiff's trial date & plaintiff is at a great disadvantage due to the fact that plaintiff does not have counsel to properly defend him at trial, he hasn't had the opportunity to prepare his witnesses, plaintiff hasn't received any response to his witness & exhibit list that he submitted to the Court, from the defendants, so plaintiff is unaware of what exhibits and/or witnesses that they will be utilizing at this trial, plaintiff has no knowledge of how to prepare opening and/or closing statements, plaintiff has no knowledge of how to present his evidence to the jury or how to question & cross-examine witness for the defendants, as well as his own witnesses.

these are just a few of the hurdles that plaintiff is facing amongst other things, & counsel would help to balance the litigation side out, as well as help plaintiff's evidence get delivered to the jury in the proper manner. Plaintiff has a lot of evidence & testimony that he wants the jury to hear & view because plaintiff believes that this trial will expose a lot of the things that are going on in the PADOC that the taxpayers don't know about, & it will give them a clear picture of the retaliation & abuses that prisoners endure just for reporting abuses & utilizing the defendants grievance procedure in good faith.

So due to the defendants ignoring plaintiff's attempt to settle this matter, plaintiff once again asks this Honorable Court to appoint him counsel so that this litigation can be fair & unprejudiced/unbiased.

Dated: 11/6/20

Respectfully Submitted,

/s/ 

Rhonshawn Jackson Pro Se